

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NITZA M. ACEVEDO-BELEN : CHAPTER 13  
:   
: BANKRUPTCY 19-13806 ELF  
DEBTOR :

**DEBTOR'S OBJECTION TO THE  
CERTIFICATION OF DEFAULT BY LAKEVIEW LOAN SERVICING, LLC**

TO THE HONORABLE ERIC L. FRANK, U.S. BANKRUPTCY JUDGE:

Movant/Debtor, **NITZA M. ACEVEDO-BELEN**, by and through her attorney, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this Objection to the Certification of Default filed by Lakeview Loan Servicing, LLC, Respondent/Creditor, and in support thereof, avers as follows:

1. On January 6, 2022, Movant/Creditor Lakeview Loan Servicing, LLC, filed a Certification of Default with this Court alleging that Debtor was in arrears on their mortgage in the amount of \$2599.68.

2. The sole reason that Movant/Creditor filed the Certification of Default is because of the alleged arrears in the mortgage payments.

3. Debtor has made payments to Movant/Creditor curing the amounts alleged on the Notice of Default. Specifically, Debtor has sent \$2,600 in money orders:

- 27789083190 - \$600 dated January 7, 2022
- 27789083188 - \$1000 dated January 7, 2022
- 27789083177 - \$1000 dated January 7, 2022

**WHEREFORE**, Debtor respectfully requests that this Court deny Creditor's request to sign the Order submitted to the Court and declare that the automatic stay is still in effect.

Respectfully submitted,

\s\ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor